

J. W. CARNEY, JR.
& Associates

Attorneys at Law

J. W. CARNEY, JR.
NATE SILVER
REYNA M. RAMIREZ

20 Park Plaza
Suite 1405
Boston, MA 02116
Tel: (617) 933-0350

JOANNA D. DOTOLI
paralegal

www.CARNEYdefense.com

April 18, 2018

VIA EMAIL AND BY U.S. MAIL

Anne Paruti
Assistant United States Attorney
U.S. Courthouse, Suite 9200
One Courthouse Way
Boston, MA 02210

RE: ***United States v. Alex Levin***
Crim. No. 15-cr-10271-WGY

Dear Anne,

We write to request discovery. Please see the requests enumerated below. If the United States is not in possession of the requested items, please indicate that in your response.

1. We request a copy of all notes relating to the on-site search of digital media at the defendant's residence.

2. We request a copy of the following: search team personnel log, evidence log, sketches, photographs, photograph logs and property receipt forms.

3. We request a copy of all notes and reports relating to any forensic testing performed on the defendant's digital media.

4. We request all information demonstrating the number of new members who joined Playpen after February 20, 2015.

5. We request all information demonstrating how many users visited Playpen during the period that the FBI operated it.

6. We request all information demonstrating how many users visited Playpen on a weekly basis before the FBI took over the site.

7. We request copies of the source code for all software that the government used to allegedly identify the defendant including the payload or "NIT"; the exploit; the "unique identifier" generator; and the server software.

8. We also request all server and internet service provider (ISP) log files that identify the specific IP address of the defendant.

If you believe that you have already provided any of these items, please let me know. Thank you for your assistance.

Yours sincerely,


J. W. Carney, Jr.